

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)
)
Plaintiff,) Case No. 07 CR 733
)
v.) Judge Milton I. Shadur
)
OLUBUNMI MASHA ,)
)
Defendant.)

**UNOPPOSED MOTION FOR ADDITIONAL TIME
TO FILE PRE-TRIAL MOTIONS**

The Defendant, Olubunmi Masha, through her undersigned attorney, Scott J. Frankel, moves this Court for an additional three (3) weeks to file any pre-trial motions. In support thereof, Defendant states as follows:

1. The Defendant's pre-trial motions are currently due on Friday, April 18, 2008.
2. The Government has produced approximately 800 pages of discovery in this matter, including extensive financial records, field reports, and transcripts.
3. Scott J. Frankel, attorney for the Defendant, has been on trial since February 5, 2008, in *United States v. Delatorre, et al.*, Case No. 03 CR 90, before Judge Castillo, in the United States District Court for the Northern District of Illinois. Although the jury has been deliberating since April 4, 2008, counsel has been unable to complete his review of the discovery because of other matters that also required his immediate attention, including, but not limited to, addressing questions from the jury, researching and preparing potential objections to jury instructions dealing with sentencing issues in the *Salazar* trial, drafting and filing a Reply brief in

People v. DeFilippo, No. 2-07-0470 an Illinois appellate matter, that was due on April 14, 2008, preparing motions in *People v. McKinney*, 2007 CF 1275 a matter pending in the Circuit Court of Waukesha, Wisconsin.

4. Counsel has spoken to the prosecutor assigned to this case, AUSA Barry Elden, and Mr. Elden has indicated that he has no objection to this three week extension.

WHEREFORE, for all the foregoing reasons, it is respectfully requested that the Defendant's Motion For Extension be granted and the Defendant be given until **May 9, 2008**, to file pre-trial motions.

Respectfully submitted,

/s/ Scott J. Frankel
Defendant's Attorney

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April 18, 2008